

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Miguel CASTRO  
[REDACTED]

Case No. SA-21-MJ-1332

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 23, 2021 in the county of Kerr in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 U.S.C. § 1324 (a)(1)(A)(ii)/(B)(i)

Alien Smuggling

PENALTIES: Maximum 10 years of imprisonment, 3 years supervised release, and \$250,000 fine.

This criminal complaint is based on these facts:

see Attachment A

☒ Continued on the attached sheet.

JESUS I MORIN

Digitally signed by JESUS I MORIN  
Date: 2021.11.24 11:19:41 -06'00'

Complainant's signature

Jesus Morin, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/24/2021City and state: San Antonio, TX

Judge's signature

Richard B. Farrer U.S. Magistrate Judge

Printed name and title

FILED  
NOV 29 2021  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY 

## AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Being duly sworn, I declare that the following is true and correct to the best of my knowledge:

1. On October 23, 2021, at approximately 12:30 a.m., Homeland Security Investigations (HSI) San Antonio special agents (SAs) received information that Miguel CASTRO (CASTRO) and [REDACTED] were going to pick up undocumented individuals (UIs) in Rocksprings, TX and transport them to Austin, TX via Interstate 10 (I-10) along with other load vehicle drivers.
2. HSI SAs notified U.S. Border Patrol agents assigned to the Rocksprings, TX station of the load vehicle descriptions, pickup location, and direction of travel. Border Patrol then shared the information with law enforcement in the area and neighboring counties along I-10. At approximately 7:00 a.m., Kerr County Sheriff's Office (KCSO) deputies observed a vehicle matching the description of one of the load vehicles and initiated a traffic stop on a silver Chevy pickup truck on I-10 around mile marker 512, in Kerr County, located in the Western District of Texas. KCSO deputies encountered CASTRO and five (5) passengers. U.S. Border patrol responded and determined CASTRO was a U.S. citizen and the five (5) passengers were undocumented individuals (UIs) with no legal documentation to enter, pass through, or remain in the U.S.
3. At approximately 7:15 a.m., KCSO deputies attempted to conduct a traffic stop further west on I-10 around mile marker 514, in Kerr County, located in the Western District of Texas, on a vehicle matching the description of another load vehicle provided by the source of information. The Dodge pickup truck failed to yield and multiple people, including the load driver, bailed out of the vehicle. KCSO apprehended a total of one (1) passenger, who was later determined to be a UI. During a search of the Dodge pickup truck, KCSO found money transmitter receipts and recent traffic citations for that vehicle in [REDACTED] name with an address in San Antonio, TX.
4. CASTRO was transported to the KCSO station and the UIs to the U.S. Border Patrol Rocksprings, TX station. HSI SAs arrived at the KCSO station and read CASTRO his Miranda Rights in the Spanish language. CASTRO acknowledged his rights, knowingly waived them, and stated he was transporting the UIs to Austin, TX for financial gain. CASTRO stated he had participated in three (3) previous human smuggling events for financial gain for a human smuggling organization. CASTRO also identified [REDACTED] as the driver of the white Dodge pickup truck that was located by KCSO. CASTRO stated [REDACTED] and other unidentified smugglers picked up approximately eighteen (18) UIs at a ranch near Rocksprings, TX adjacent to I-10 and were going to get paid upon arrival at an H-E-B store in Austin, TX. HSI SAs showed CASTRO a six-person photo array containing [REDACTED] CASTRO positively identified him as the driver of the white Dodge pickup truck involved in the failed human smuggling event that day.

5. All UIs were interviewed and admitted to being smuggled into the U.S. for a smuggling fee.

Based upon the information set forth above, there is probable cause to believe that Miguel Castro and [REDACTED] committed the offense of alien smuggling in violation of Title 8 United States Code, Section 1324(a)(1)(A)(ii)/(B)(i).

JESUS I MORIN Digitally signed by JESUS I MORIN  
Date: 2021.11.24 11:20:17 -06'00'

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Jesus Morin  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me  
on November 24, 2021



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UNITED STATES MAGISTRATE JUDGE  
RICHARD B. FARRER